## **REMARKS**

After entry of this amendment, claims 1 and 3-16 are pending. In the present Office Action, claims 1 and 3-16 were rejected under 35 U.S.C. § 112, second paragraph. Claim 1 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Gaines et al., U.S. Patent No. 5,961,582 ("Gaines") in view of Kawabe et al., U.S. Patent No. 5,819,044 ("Kawabe") and Waldo et al., U.S. Patent No. 6,016,500 ("Waldo"). Claims 3-6 were rejected under 35 U.S.C. § 103(a) over Gaines in view of Kawabe, Waldo, and various other cited art. Claims 7 and 12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chrabaszcz, U.S. Patent No. 6,108,715 ("Chrabaszcz") in view of Draves, U.S. Patent No. 5,802,590 ("Draves") and Leach et al., U.S. Patent No. 6,108,715 ("Leach"). Claims 8-11 and 13-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chrabaszcz in view of Draves, Leach, and various other cited art. Applicants respectfully traverse these rejections and request reconsideration.

#### Claims 1 and 3-6

Applicants respectfully submit that each of claims 1 and 3-6 recites a combination of features not taught or suggested in the cited art. For example, claim 1 recites a combination of features including: "translating a combination of said application identifier and said resource identifier to said virtual resource identifier when the resource identifier is passed from the operating system to the application; and translating a combination of said application identifier and said virtual resource identifier to said resource identifier when the virtual resource identifier is passed from the application to the operating system".

The present Office Action alleges that Gaines teaches "translating said resource identifier to said virtual resource identifier when the resource identifier is passed from the operating system to the application" at col. 7, lines 53-60. Applicants respectfully disagree. These teachings are: "Some of the virtual files 163 may correspond to actual files or file system objects 107; requests for services that affect these virtual files 163 are implemented by direct changes to the actual files or file system objects 107. The file system filter 161 scrutinizes a request for service requiring access to one of these virtual

files 163 to determine if the virtual application 143 requesting service has virtual permissions 147 to access the virtual file 163." Nothing in this section teaches or suggests "translating said resource identifier to said virtual resource identifier when the resource identifier is passed from the operating system to the application". Furthermore, nothing in this section teaches or suggests "translating a combination of said application identifier and said resource identifier to said virtual resource identifier when the resource identifier is passed from the operating system to the application" as recited in claim 1.

The Office Action further alleges that "translating said virtual resource identifier to said resource identifier when the virtual resource identifier is passed from the application to the operating system" is taught in Kawabe at col. 10, lines 41-61. Specifically, the Office Action alleges that "vname3" is a virtual resource identifier. Applicants respectfully submit that even if, arguendo, "vname3" where a virtual identifier, Kawabe's teachings at col. 10, lines 41-61 would still not teach or suggest "translating a combination of said application identifier and said virtual resource identifier to said resource identifier when the virtual resource identifier is passed from the application to the operating system" as recited in claim 1.

Furthermore, the Office Action alleges that Gaines teaches "registering an application by associating a unique application identifier with the application, and passing said application identifier to a software module that processes transitions between the application and the operating system" at col. 5, lines 54-64. However, these teachings are: "The host computer 101 executes one or more application programs 121, which have been created or programmed by users and which call upon the application interface 111 for services from the operating system 103. The operating system 103 controls a set of resources 122 of the host computer 101 that it presents to the application program 121 by means of the application interface 111, possibly including access to drivers 112 and their devices 108. The application interface 111 comprises a set of entry points 123 that the application program 121 invokes to cause the application interface 111 and the operating system 103 to be executed." Nothing in this section teaches or suggest "associating a unique application identifier with the application, and passing said application identifier

to a software module that processes transitions between the application and the operating system" as recited in claim 1.

For at least all of the above stated reasons, Applicants respectfully submit that claim 1 is patentable over the cited art. Claims 3-6 depend from claim 1, and similarly are patentable over the cited art for at least the above stated reasons. Each of claims 3-6 recites additional combinations of features not taught or suggested in the cited art.

## Claims 7-16

Applicants respectfully submit that each of claims 7-16 recite combinations of features not taught or suggested in the cited art. For example, claim 7 recites a combination of features including: "translate a combination of said application identifier and said resource identifier to said virtual resource identifier when the resource identifier is passed from the operating system to the application; and translate a combination of said application identifier and said virtual resource identifier to said resource identifier when the virtual resource identifier is passed from the application to the operating system".

The Office Action alleges that Leach teaches translating resource identifiers at col. 5, line 65 to col. 6, line 20. This section teaches standard virtual to physical address translation in processors. Specifically, Leach teaches "As the amount of physical address space is limited, a concept known as memory virtualization has been developed. This concept allows computer programs to utilize an address space that is larger than that actually available in the computer system's main memory. Memory virtualization is accomplished by allowing software programs to reference memory addresses that do not directly correlate to physical memory addresses. The memory locations that software programs address are known as virtual addresses. Collectively, a grouping of virtual addresses form a virtual address space. Similarly, a grouping of physical memory addresses form a physical address space. When a software program attempts to access a virtual memory address, the computer system translates the virtual memory address into a physical memory address." (Leach, col. 6, lines 3-18) Nothing in these teachings teaches or suggests "translate a combination of said application identifier and said virtual

resource identifier to said resource identifier when the virtual resource identifier is passed from the application to the operating system". Furthermore, nothing in these teachings teaches or suggests "translate a combination of said application identifier and said resource identifier to said virtual resource identifier when the resource identifier is passed from the operating system to the application" as recited in claim 7.

For at least the above stated reasons, Applicants submit that claim 7 is patentable over the cited art. Claims 8-11, being dependent from claim 7, are similarly patentable over the cited art for at least the above stated reasons as well. Each of claims 8-11 recites additional combinations of features not taught or suggested in the cited art.

Claim 12 recites a combination of features including: "translating a combination of said application identifier and said resource identifier to said virtual resource identifier when the resource identifier is passed from the operating system to the application; and translating a combination of said application identifier and said virtual resource identifier to said resource identifier when the virtual resource identifier is passed from the application to the operating system". The teachings of Leach, highlighted above, do not teach or suggest the above highlighted features of claim 12, either. Accordingly, Applicants submit that claim 12 is patentable over the cited art. Claims 13-16, being dependent from claim 12, are similarly patentable over the cited art for at least the above stated reasons as well. Each of claims 13-16 recites additional combinations of features not taught or suggested in the cited art.

#### Section 112 Rejection

The section 112 rejection identified an antecedent basis problem for the term "the virtual resource driver" in claims 1, 7, and 12. Applicants have amended claims 1, 7, and 12 to recite instead "the virtual resource identifier", for which there is proper antecedent basis in each claim. Applicants submit that the amendment overcomes the rejection.

# **CONCLUSION**

Applicants submit that the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5760-22500/LJM.

Also enclosed herewith are the following items:
□ Return Receipt Postcard □
Petition for Extension of Time
Request for Approval of Drawing Changes
☑ Notice of Change of Address
☐ Fee Authorization Form authorizing a deposit account debit in the amount of \$
for fees ( ).
Other:

Respectfully submitted,

Lawrence J. Merkel

Reg. No. 41,191

AGENT FOR APPLICANT(S)

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